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*Attorneys for Plaintiff Todd VanDeHey*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TODD VANDEHEY, an individual,

Plaintiff,

vs.

REAL SOCIAL DYNAMICS, INC., a Nevada  
corporation; NICHOLAS KHO, an individual;  
OWEN COOK, an individual; AMBER KHO, an  
individual, John Does 2 through 10, all whose true  
names are unknown; ABC Companies 1 through  
10, all whose true names are unknown,

Defendants.

REAL SOCIAL DYNAMICS, INC., a Nevada  
corporation; NICHOLAS KHO, an individual;  
OWEN COOK, an individual; AMBER KHO, an  
individual,

Counterclaimants,

and

VALENTINE LIFE, a Nevada corporation,

Nominal Counterclaimant,

vs.

TODD VANDEHEY, an individual,

Counter-defendant.

Case No.: 2:17-cv-02230-JAD-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR THE  
PARTIES TO COMPLY WITH  
MAY 3, 2024 ORDER (ECF No. 123)**

**(First Request)**

1 Plaintiff Todd VanDeHey, Counterdefendants Valentine Life and Todd VanDeHey, and  
 2 Defendants/Counterclaimants Real Social Dynamics, Inc., Nicholas Kho, Owen Cook and Amber  
 3 Kho hereby stipulate and agree to the following:

- 4 1) On June 29, 2018, the Court entered an Order (ECF No. 91) granting in part  
 5 Defendants/Counterclaimants' motion to compel arbitration, denying Plaintiff's motion  
 6 for summary judgment as moot and staying the case;
- 7 2) This matter remained stayed from June 29, 2018 through March 26, 2024, at which time  
 8 the Court entered an Order (ECF No. 120) granting Plaintiff's motion to confirm the  
 9 arbitration award, lifting the stay and directing the parties to appear for a status hearing  
 10 on April 16, 2024;
- 11 3) At the time of the April 16, 2024 status hearing, counsel for Plaintiff/Counterdefendants  
 12 advised the Court that Plaintiff intends to move for leave to amend the operative  
 13 pleading to add parties and claims, and counsel for Defendants/Counterclaimants'  
 14 advised the Court that Defendants intend to file a dispositive motion;
- 15 4) Counsel for Plaintiff/Counterdefendants represents that the motion for leave to amend  
 16 the operative pleading was in progress at the time the Court entered the Order (ECF No.  
 17 123) on May 6, 2024 directing the parties to file a stipulation by May 10, 2024  
 18 identifying the claims and parties remaining in the case, identifying the discovery  
 19 completed to date, identifying the discovery remaining to be completed and proposing  
 20 a schedule for advancing the case;
- 21 5) Counsel for Plaintiff/Counterdefendants represents that court appearances and client  
 22 obligations in other matters on May 7-10 render it very difficult to comply with the May  
 23 10, 2024 deadline; therefore, counsel for Plaintiff/Counterdefendants contacted counsel  
 24 for Defendants/Counterclaimants to stipulate to a request for a two-week extension;

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- 6) This is the first request to extend the deadline to comply with the May 3, 2024 Order (ECF No. 123); and
- 7) The undersigned represent that this stipulation is not designed for purposes of delay.

DATED this 9th day of May, 2024.

McDONALD CARANO LLP

MAIER GUTIERREZ & ASSOCIATES

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*Attorneys for TODD VANDEHEY and  
VALENTINE LIFE*

**NO FURTHER EXTENSIONS  
WILL BE GRANTED.**

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: May 10, 2024

**McDONALD CARANO**

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